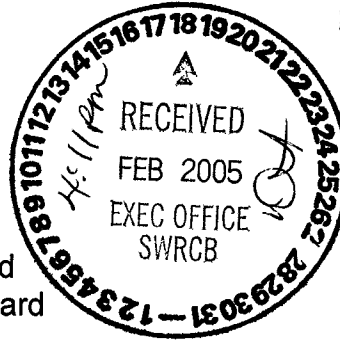


SPECIAL HEARING
2/3/05
cc: BD, DI, DWQ
e-cys: BD, CC, HMS, TH, CMW

**CALIFORNIA COUNCIL FOR ENVIRONMENTAL
AND ECONOMIC BALANCE**
100 Spear Street, Suite 805, San Francisco, CA 94105

VIA EMAIL AND U.S. MAIL



120. California Council for
environmental and economic
Balance

February 18, 2005

Ms. Debbie Irvin, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
P.O. Box 100
Sacramento CA 95812-0100
dirvin@waterboards.ca.gov

**Re: CCEEB Comments on the Draft of the National Pollutant Discharge
Elimination System General Permit for Discharges of Storm Water Associated
with Industrial Activities**

Dear Ms. Irvin:

The California Council for Environmental and Economic Balance ("CCEEB") is a nonprofit, nonpartisan coalition of business, labor and public leaders that works to advance policies that protect the environment while also allowing for continued economic growth. The following are CCEEB's comments regarding the December 15, 2004 proposed General Permit for Discharges of Storm Water Associated with Industrial Activities.

1. CCEEB supports the iterative BMP based approach. CCEEB will only consider supporting an iterative BMP approach with benchmarks when it is consistent with USEPA's guidance.

CCEEB supports the approach of iterative BMPs and benchmarks, but only as applied in a manner consistent with USEPA's guidelines to regulate industrial storm water discharges. The present approach of this draft permit is not consistent with USEPA and the State's guidance on storm water. Storm water discharges are very different from traditional process wastewater discharges. It varies significantly in timing, duration, quality, quantity, and flow. It is difficult to monitor and its source is not subject to the control of the discharger.

CCEEB is concerned that the proposed General Permit implements the benchmarks as a trigger for an iterative BMP process based on single grab samples and single storm events (also what about the concerns for the increased paperwork and sampling requirements if the iterative process is triggered?). Storm water samples are very